## IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF TENNESSEE NASHVILLE DIVISION

TENNESSEE CONFERENCE OF THE	)	
NATIONAL ASSOCIATION FOR THE	)	
ADVANCEMENT OF COLORED	)	
PEOPLE, et al.,	)	
	)	
Plaintiffs,	)	No. 3:20-cv-01039
	)	
v.	)	Judge Campbell
	)	Magistrate Judge Frensley
	)	
WILLIAM LEE, et al.	)	
	)	
Defendants.	)	

## **DEFENDANTS' MOTION TO DISMISS**

Pursuant to Rule 12(b)(1) and (6), Fed. R. Civ. P., Defendants move the Court to dismiss this case in its entirety for lack of standing and for failure to state a claim. A Memorandum of Law in support of this Motion is filed herewith.

Respectfully submitted,

HERBERT H. SLATERY III Attorney General and Reporter

/s/ Janet M. Kleinfelter

JANET M. KLEINFELTER (BPR 013889)

Deputy Attorney General
Janet.kleinfelter@ag.tn.gov

ANDREW B. CAMPBELL (BPR 014258) Senior Assistant Attorney General Andrew.campbell@ag.tn.gov MATTHEW D. CLOUTIER (BPR 036710) Assistant Attorney General Matt.cloutier@ag.tn.gov

KELLEY L. GROOVER (BPR 034738) Assistant Attorney General Kelley.Groover@ag.tn.gov

Office of the Tennessee Attorney General Public Interest Division P.O. Box 20207 Nashville, TN 37202 (615) 741-7403

Attorneys for Defendants

## CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing document has been forwarded electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to the parties named below. Parties may access this filing through the Court's electronic filing system.

Danielle Lang Mark Graber Aseem Mulji Campaign Legal Center 1101 14<sup>th</sup> Street NW, Suite 400 Washington, DC 20005

Phil Telfeyan Natasha Baker Equal Justice Under Law 400 7<sup>th</sup> St. NW, Suite 602 Washington, DC 20004

Date: December 30, 2020

Charles K. Grant
Denmark J. Grant
Baker, Donelson, Bearman
Caldwell & Berkowitz, P.C.
211 Commerce Street, Suite 800
Nashville, TN 37201

Keeda Haynes Free Hearts 2013 25<sup>th</sup> Ave. N. Nashville, TN 37208

/s/ Janet M. Kleinfelter
JANET M. KLEINFELTER (BPR 013889)
Deputy Attorney General